

AO 91 (Rev. 11/11) Criminal Complaint

ORIGINAL

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

United States of America

v.

Donnie Arlondo Ferrell

Defendant(s)

NORTHERN DISTRICT OF TEXAS

FILED

FEB 22 2018

CLERK, U.S. DISTRICT COURT

By

Deputy

Case No. 3:18-MJ-109-BT

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 19, 2018 in the county of Dallas in the
Northern District of Texas, the defendant(s) violated:

Code Section

18 U.S.C. §§ 1111 and 1114 (1)

Offense Description

murder of an officer or employee of the United States or of any agency in any branch of the United States government, while such officer or employee was engaged in or on account of the performance of official duties.

This criminal complaint is based on these facts:

See attached affidavit of Postal Inspector Thomas Halsell

☒ Continued on the attached sheet.



Complainant's signature

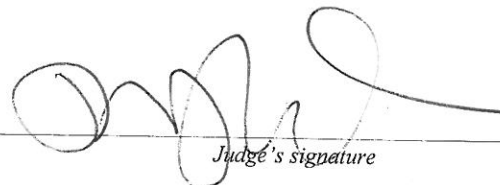
Thomas Halsell, Postal Inspector, USPS

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/21/2018

City and state: DALLAS, TEXAS



Judge's signature

REBECCA RUTHERFORD, U.S. MAG. JUDGE

Printed name and title

Affidavit in Support of Criminal Complaint

I, Thomas Halsell, having been duly sworn, do depose and state as follows:

1. I am currently employed as a U.S. Postal Inspector with the United States Postal Inspection Service and have been so employed for the past 12 years. I am currently assigned to the DHQ Miscellaneous Team for the Fort Worth Division of the U.S. Postal Inspection Service. Part of my responsibilities as a member of the DHQ Miscellaneous Team is the investigation of assaults and threats to include murder of United States Postal Service employees in violation of Title 18, United States Code, Sections 1111 and 1114, Protection of Officers and Employees of the United States. I have participated and received training relative to criminal investigations involving violent crimes from the U. S. Postal Inspection Service.

2. I am an "investigative or law enforcement officer of the United States" within the meaning of 18 U.S.C. § 3061.

3. This affidavit is made for the limited purposes of establishing probable cause that **Donnie Arlondo Ferrell** has committed offenses in violation of 18 U.S.C. §§ 1111 and 1114(1), that is the murder of an officer or employee of the United States or of any agency in any branch of the United States government, while such officer or employee was engaged in or on the account of the performance of official duties.

4. The information contained in this affidavit is based on my personal knowledge and experience, my personal participation in this investigation, and information obtained from other law enforcement officers and/or agents involved in this investigation.

5. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that a violation of 18 U.S.C. §§ 1111 and 1114(1) has been committed by **Donnie Arlondo Ferrell**.

FACTS AND CIRCUMSTANCES

6. On February 19, 2018, shortly after 2:00 a.m., United States Postal Service (“USPS”) employee Tony Mosby was shot and killed while driving his postal vehicle eastbound on I-30, in Dallas, Texas, which is in the Northern District of Texas.

7. Investigation revealed that Mosby regularly works a nighttime shift at USPS at 401 Dallas/Fort Worth Turnpike, Dallas, Texas (hereinafter the “Main Post Office” or “MPO”) and was working on the night of February 18, 2018 and into the morning of February 19, 2018.

8. At approximately 2:00 a.m. on February 19, 2018, Mosby left the MPO in a USPS box truck and headed westbound. Mosby made a U-turn at Sylvan Avenue, Dallas, Texas. Mosby then proceeded eastbound on the ramp for I-30.

9. Minutes later, at least three gunshots were fired at Mosby and his truck, while he was driving his USPS truck as part of his official duties. One of the shots fatally struck Mosby in his head, based on information provided by the medical examiner. Preliminary investigation revealed that Mosby was struck by a .38 caliber bullet. Mosby’s vehicle then crashed into the inside concrete barrier on I-30 and skidded to a halt, remaining against the inside barrier.

10. On the morning of February 21, 2018, two individuals, identified here as A.G. and J.T., visited the FBI's office in Fort Worth, Texas, and stated that they had information related to the killing of Mosby.

11. In interviews, both A.G. and J.T. stated that, on the night of February 18, 2018, they met two other individuals – **Donnie Arlondo Ferrell**, and an individual identified here as C.W. – at a restaurant in Dallas, Texas.

12. Later that night, and after other stops, all four of these individuals (A.G., J.T., C.W., and **Ferrell**) went to a pool hall in Dallas, Texas. They spent some time in the pool hall. All four consumed alcohol.

13. The four individuals left the pool hall (A.G., J.T., C.W., and **Ferrell**) at approximately 1:30 a.m. in the early morning of February 19, 2018. All four were traveling in a 2008 Mazda Tribute SUV (hereinafter the "vehicle"). C.W. was driving this vehicle. **Ferrell** was sitting in the front passenger seat. A.G. was sitting in rear left seat. J.T. was sitting in the right rear seat.

14. Shortly after 2:00 a.m., the vehicle was traveling eastbound on I-30.

15. According to A.G. and J.T., C.W. was driving erratically and, at one point, was right behind a large USPS truck. Mosby was driving this USPS truck. C.W. attempted to drive the vehicle around the USPS truck by passing it on the USPS truck's left hand side. C.W. then passed Mosby's truck.

16. Moments later, both A.G. and J.T. observed **Ferrell** fire several shots from a handgun in the direction of Mosby's truck. A.G. and J.T. described this handgun as being a revolver or similar to a revolver. I know from experience that a revolver does not eject

shell casings. I also know that a popular size round used in a revolver is a .38 caliber (the same that was found to be the fatal shot in relation to Mosby).

17. J.T. looked back towards Mosby's truck and observed smoke and sparks. A.G. observed sparks and the USPS truck crashing into the barrier.

18. A.G. asked **Ferrell** why he had shot the handgun toward the truck. **Ferrell** stated that the driver of the USPS truck had made a hand gesture towards their vehicle and that angered **Ferrell**.

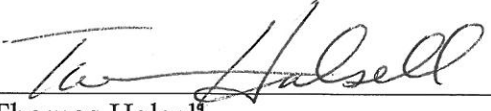
19. C.W. and **Ferrell** then dropped A.G. and J.T. off at a hotel in Dallas, Texas.

20. On the evening of Monday, February 19, 2018, A.G. learned that Mosby had been killed. A.G. contacted **Ferrell** and informed him of this fact. **Ferrell** asked A.G. not say anything about the incident to anyone else. Shortly thereafter, **Ferrell** sent a text message to J.T. My understanding of this text message was that it was designed to convince J.T. to not talk about the shooting with anyone else.

21. The information provided by A.G. was corroborated by the information provided by J.T. The information provided by J.T. was corroborated by A.G. Agents have recovered video recordings near the scene of the shooting and elsewhere. These recordings corroborate the information provided by A.G. and J.T.


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22. I believe there is probable cause to believe that a violation of 18 U.S.C. §§ 1111 and 1114 (1) has been committed by **Donnie Arlondo Ferrell**.



Thomas Halsell
Postal Inspector, USPS
Dallas, Texas

Subscribed and sworn to before me this 21st day of February, 2018.



HON. REBECCA RUTHERFORD
United States Magistrate Judge
Northern District of Texas